

Subject: RE: Art's - Discovery status and 30(b)(6) date
Date: Friday, September 27, 2019 at 2:25:10 PM Central Daylight Time
From: Larry Johnson
To: Nathaniel Cade
Attachments: image002.png, image003.png, 2019.09.27 30(b)(6) Notice.pdf

Nate,

Attached is the notice for the deposition on 10/10. I still do not have any documents, or any written responses to our requests. I will also send you a stipulation to amend the schedule regarding our conditional certification deadline as we previously agreed.

Thank you,

Larry A. Johnson
Shareholder



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From: Nathaniel Cade <nate@cade-law.com>
Sent: Wednesday, September 11, 2019 3:08 PM
To: Larry Johnson <ljohnson@hq-law.com>
Subject: Re: Art's - Discovery status and 30(b)(6) date

Larry – After speaking with Lyle, I can confirm Oct. 10 for his deposition.

I still hope to have documents to you tomorrow. I had left several messages for a woman at Lyle's accounting firm, only to find out today that she is out on maternity leave (and she is not his accountant, just an admin that Lyle spoke with). I did speak to the CPA at the firm, and she is going to pull records to see if they have anything that would identify dancers at the club, including if there were any workers comp payments. She also is contacting Lyle's old accounting firm (3 years prior) to see what they may or may not have.

I am continuing to hunt things down. Unfortunately, Monday was a time suck, as I was rear-ended at 67th & Silver Spring (3 blocks from District 4) by a driver with no insurance. But, I will continue to work to get you documents.

Nate Cade
(414) 255-3811 (direct)
nate@cade-law.com

From: Larry Johnson <ljohnson@hq-law.com>
Date: Tuesday, September 10, 2019 at 11:05 AM
To: Nate Cade <nate@cade-law.com>

Cc: Summer Murshid <smurshid@hq-law.com>, Timothy Maynard <tmaynard@hq-law.com>

Subject: Art's - Discovery status and 30(b)(6) date

Nate,

During our call on 9/4, you indicated that you do not have any documents yet from your client. However, you were hopeful that by Thursday of this week, you would have responsive documents. Additionally, we discussed 30(b)(6) dates and we agreed to hold October 9/10 pending confirmation from your client which you anticipated having by the end of last week. Please let me know if your client is available for the deposition on October 9 or October 10.

Thank you,

Larry A. Johnson
Shareholder



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